## **Baker & Hostetler LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

1900 East 9th Street, Suite 3200

Cleveland, Ohio 44114 Telephone: (216) 861-7834

Fax: (216) 696-0740

Brett Wall (*admitted pro hac vice*) Email: bwall@bakerlaw.com

Jason Perdion (admitted pro hac vice) Email: jperdion@bakerlaw.com David Proaño (admitted pro hac vice)

Email: dproano@bakerlaw.com

Gretchen Lange (admitted pro hac vice)

Email: glange@bakerlaw.com

Darren Crook (admitted pro hac vice)

Email: dcrook@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Adv. Pro. No. 10-04308 (SMB)

Plaintiff.

v.

LEWIS ALPERN

and

JANE ALPERN,

Defendants.

## **AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1) The Initial Disclosures shall be due on July 15, 2014.
- 2) Fact Discovery shall be completed by August 14, 2015.
- 3) The Disclosure of Case-in-Chief Experts shall be due on December 2, 2015.
- 4) The Disclosure of Rebuttal Experts shall be due on January 4, 2016.
- 5) The Deadline for Completion of Expert Discovery shall be March 15, 2016.
- 6) The Deadline for Service of a Notice of Mediation Referral Shall be: On or before May 18, 2016.
- 7) The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before June 1, 2016.

8) The Deadline for Conclusion of Mediation shall be: On or before October 3,

2016.

Dated: New York, NY

November 3, 2015

Respectfully submitted,

By: /s/ Nicholas Cremona\_

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas Cremona

Email: ncremona@bakerlaw.com

1900 East 9th Street, Suite 3200

Cleveland, Ohio 44114

Telephone: (216) 861-7834

Fax: (216) 696-0740

Brett Wall (admitted pro hac vice)

Email: bwall@bakerlaw.com

Jason Perdion (admitted pro hac vice)

Email: jperdion@bakerlaw.com

David Proaño (*admitted pro hac vice*)

Email: dproano@bakerlaw.com

Gretchen Lange (admitted pro hac vice)

Email: glange@bakerlaw.com

Darren Crook (admitted pro hac vice)

Email: dcrook@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff